

**COUNTY OF HAWAII**  
**PLAN TO REDUCE THE COLLECTION AND**  
**USE OF SOCIAL SECURITY NUMBERS**

I. References

2008 Hawaii Sess. Laws. (Special Session) Act 10

II. Purpose

Development of a written plan to eliminate the unnecessary collection and use of social security numbers ("SSNs") by the County of Hawaii ("COH").

III. Definitions

"County" means the County of Hawaii.

"Consumer reporting agencies" means entities which meets the definition of "consumer reporting agency" set forth in 15 U.S.C. Section 1681a (f) and are currently operating as such under 15 U.S.C. Section 1681, et seq.

"Managing Director" means the Managing Director of the County of Hawaii or the Managing Director's designee.

"Director" means the Director of each department in the County of Hawaii or the Director's designee.

"Personal information" shall be as defined in HRS Section 487N-1.

IV. Application

COH's plan is applicable to all of its departments.

V. Duties and Responsibilities

- A. The Managing Director is responsible for the overall development and implementation of COH's plan for eliminating the unnecessary collection and use of SSNs.
- B. Each Director is responsible for implementing the plan within his/her respective department, including but not limited to developing implementation processes and procedures to ensure completion of all reviews and reports required under the plan.
- C. Division heads and staff members are responsible for complying with their department's implementation processes and procedures

as well as departmental directives governing the overall implementation process.

VI. Eliminating Unnecessary Collection and Use of SSNs

A. Requirements

Act 10 requires that each agency plan include provisions requiring the collection and use of SSNs only when mandated by federal or state law or when the SSN is the only identifier currently available. The plan must also include a provision indicating that when an agency must collect the SSN due to federal or state law or if the SSN is the only identifier currently available, the agency is required to proceed as reasonably necessary for the proper administration of lawful agency business. In addition, the agency's plan must require the development of an alternative unique identifier to replace the agency's current discretionary use of SSNs. Finally, an agency's plan must consider that consumer reporting agencies shall continue to have access to personal information, including nine digit SSNs.

B. Plan

1. A representative from each department will be selected by its Director to implement the COH plan to reduce the collection and use of SSNs within their department.
2. Each department will be responsible for reviewing its records and electronic databases and identifying points of SSN collection and/or use.
  - a. For each such SSN collection and/or use, an action plan shall be prepared by the department indicating how it intends to:
    - i. Protect SSNs, which are either required by federal or state law or are the only identifiers currently available, from unauthorized disclosure including truncation of the SSNs if appropriate;
    - ii. Eliminate the collection and use of SSNs for which other personal identifiers are available or which are not required to be collected and/or used by federal or state law, including a date when such collection and use will be eliminated; and

- iii. Develop an alternative unique identifier to replace the division's discretionary use of SSNs, including a date when the SSNs will be converted.
  - b. A copy of the action plan shall be provided to the Managing Director by December 31, 2009.
- 3. Collection and/or use of SSNs by COH shall only be allowed when required by federal or state law or if the SSN is the only identifier currently available. However, where the collection and/or use of an SSN is necessary based on requirements placed on COH by outside sources, further actions involving the elimination or replacement of those SSNs will depend upon the requirements of and/or guidance provided by such sources.
- 4. When COH is required by federal or state law to collect SSNs or when the SSNs are the only identifiers currently available, the department will proceed as reasonably necessary for the proper administration of lawful agency business.
- 5. Consumer reporting agencies will continue to have access to personal information, including nine digit SSNs, provided such access is authorized by law.
- 6. The Managing Director may schedule meetings and/or develop additional procedures to ensure departments maintain their plans to eliminate the unnecessary use and collection of SSNs.

## VII. Preserving the Elimination of Unnecessary SSN Collection and Use

### A. Maintenance

- 1. Each department's designated representative will be responsible for periodically reviewing its records and electronic databases for collections and/or uses of SSNs which were previously unreported.
- 2. If a department discovers a previously unreported collection or use, the department shall prepare an action plan in accordance with Section VI.B.2.a/b for each newly discovered collection or use of SSNs.
- 3. 90 days following the development of its action plan(s), each department shall provide the Managing Director with a status report indicating actions completed and actions

pending. For each pending action, the department shall report on the estimated timeline for the action to be completed.

B. Verification

1. Each department's designated representative will be responsible for periodically reviewing its records and electronic databases to verify the SSN remains the only available identifier, or collection and use of the SSN continues to be required by federal or state law.
  - a. If a department discovers collection and/or use of an SSN for which other personal identifiers are available or which is no longer required by federal or state law, the department shall prepare an action plan in accordance with Section VI.B.2.a/b for each collection or use.
2. Each department's designated representative will be responsible for periodically reviewing its records and electronic databases to verify the SSN use and collection continues to be necessary for the proper administration of the department's lawful agency business.
  - a. If a department discovers collection and/or use of an SSN for which it is no longer necessary for the proper administration of the department's lawful business, the department shall prepare an action plan in accordance with Section VI.B.2.a/b for each collection or use.
3. 90 days following the development of its action plan(s), each department shall provide the Managing Director with a status report indicating actions completed and actions pending. For each pending action, the department shall report on the estimated timeline for the action to be completed.